

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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|----------------------------|---|-----------------------|
| In re: |) | Chapter 9 |
| |) | |
| CITY OF DETROIT, MICHIGAN, |) | Case No. 13-53846 |
| |) | |
| Debtor. |) | Hon. Thomas J. Tucker |
| |) | |

**STIPULATION TO WITHDRAW SUPERSEDED CLAIM NUMBERS 3802, 3803, 3804,
3805, 3806, 3807 AND 3808**

Debtor, the City of Detroit (the “City”) and Claimants, Cambridge Tower Associates, Hyde Park Co-Operative, Millender Center Associates, Village Center Associates, Bowin Place Associates, Plymouth Square Ltd. Housing Association, Fenimore Ltd. Dividend Housing Association (“Housing Association Claimants”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Withdrawing Claim Numbers 3802, 3803, 3804, 3805, 3806, 3807, and 3808*, attached hereto as **Exhibit 1**.

1. On January 12, 2015, the Housing Association Claimants filed proofs of claim 3802, 3803, 3804, 3805, 3806, 3807, and 3808 (“Original Housing Association Claims”), as permitted in a settlement agreement with the City.

2. On January 20 and 22, 2015, the Housing Association Claimants filed proofs of claim 3809, 3810, 3811, 3812, 3813, 3814, and 3815 (the “Amended Housing Association Claims”), amending their previously filed claims.

3. In consideration of the withdraw of the City’s objection to the Amended Housing Association Claims, the Housing Association Claimants hereby withdraw the Original Housing Association Claims in their entirety.

WHEREFORE, the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Original Housing Association Claims.

Respectfully submitted by:

| THORNBLADH LEGAL GROUP, PLLC | FOLEY & LARDNER, LLP |
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EXHIBIT 1: PROPOSED ORDER

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re : Chapter 9
: Case No. 13-53846
CITY OF DETROIT, MICHIGAN, :
: Hon. Thomas J. Tucker
Debtor :
----- x

**ORDER WITHDRAWING CLAIM NUMBERS 3802, 3803, 3804, 3805,
3806, 3807, AND 3808 OF THE HOUSING ASSOCIATION CLAIMANTS**

This matter having come before the Court on the *Stipulation to Withdraw Superseded Claim Numbers 3802, 3803, 3804, 3805, 3806, 3807 and 3808*; the Housing Association Claimants¹ having filed the Original Housing Association Claims in the above-captioned bankruptcy case; the Housing Association Claimants having filed the Amended Housing Association Claims; the City having agreed to withdraw its objection to the Amended Housing Association Claims; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. The Original Housing Association Claims [Claim Nos. 3802, 3803, 3804, 3805, 3806, 3807 and 3808] are withdrawn in their entirety.
2. The Amended Housing Association Claims [Claim Nos. 3809, 3810, 3811, 3812, 3813, 3814, and 3815] are allowed as general unsecured, non-priority claims.
3. The City's claims agent is hereby authorized to update the claims register to reflect the relief granted in this Order.

¹ Capitalized terms not otherwise defined herein shall have the meaning given to them in the Stipulation.

4. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.